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6
7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **OAKLAND DIVISION**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

v.

12 RICHARD ACOSTA,

13 Defendant.

Case No. 17-CR-00337-HSG

**STIPULATION AND [PROPOSED] ORDER
TO MODIFY CONDITIONS OF
PRETRIAL RELEASE AS MODIFIED**

14
15 Defendant Richard Acosta is seeking permission to modify his conditions of pretrial
16 according to stipulation between the parties.

17 Mr. Acosta's minor daughter, S. A., of whom Mr. Acosta has joint custody, will be
18 spending the summer months at a tennis program and staying with her grandmother, Carolyn
19 Cults, at Ms. Cults' home in Atwater, California (in the Eastern District of California). Mr.
20 Acosta will continue to reside at home in Oakland under his current terms of pretrial release but
21 asks that the Court grant him permission to travel to Ms. Cults' home in the event of an
22 emergency or to visit his daughter as directed by Pretrial Services. Mr. Acosta will notify and
23
24

1 communicate with defense counsel and Pretrial Services if such circumstance were to occur.

2 Pretrial Services has been notified of this request and has no objection.

3 The parties therefore request and stipulate that Mr. Acosta be granted the Court's
4 permission to travel to and reside at Carolyn Cults' residence at 151 Castle Drive, Atwater, CA
5 95301 in the event of an emergency or in order to visit his daughter as directed by Pretrial
6 Services.

7
8 DATED: June 21, 2017

Respectfully submitted,

9 BRIAN STRETCH
10 United States Attorney

11 /s/
SHEILA ARMBRUST
12 Assistant United States Attorney

13 /s/
JAMES R. STEVENS
14 Wolf, Pennella & Stevens, LLP
Attorney for Defendant
15 Richard Acosta

16 IT IS SO ORDERED.

17 DATED: 6/23/17

18 Kandis Westmore
HON. KANDIS WESTMORE
United States Magistrate Judge